

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE 8501 CONDOMINIUMS, a Washington  
Non-Profit Corporation,

Plaintiff,

v.

COMMONWEALTH INSURANCE  
COMPANY OF AMERICA, a Delaware  
Corporation; ACCELERANT NATIONAL  
INSURANCE COMPANY, a Delaware  
Corporation; and DOE INSURANCE  
COMPANIES 1-10,

Defendants.

No.: 2:22-cv-1412

STIPULATED MOTION TO CONTINUE  
THE DISCOVERY AND DISPOSITIVE  
MOTION DEADLINES

**NOTE ON MOTION CALENDAR:  
OCTOBER 10, 2023**

Plaintiff The 8501 Condominiums (the “Association”) and Defendants  
Commonwealth Insurance Company of America and Accelerant National Insurance  
Company (collectively “Defendants”) stipulate to this motion for a brief continuance of the  
discovery and dispositive motions deadlines.

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause  
and with the judge’s consent.” Good cause exists here because the parties have scheduled  
mediation in this matter for November 1, 2023. For purposes of judicial economy, the parties  
propose that the discovery and dispositive motions deadlines be briefly continued to avoid

incurring additional expenses on behalf of the parties should the matter resolve during mediation. This extension is not made for purposes of delay, but rather to permit the parties additional time in an attempt to resolve this matter amicably without incurring substantial further costs or requiring additional time and resources on behalf of the Court. The parties respectfully request that the Court extend the currently scheduled deadline as set forth below. A proposed order is included herewith.

Event	Current Deadline	New Deadline
Discovery Motion Deadline	9/27/2023	10/27/2023
Rebuttal Expert Deadline	10/11/2023	11/10/2023
Discovery Deadline	10/30/2023	11/30/2023
Dispositive Motions Deadline	11/27/2023	12/18/2023

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the discovery and dispositive motions deadlines due to the reasons set forth above.

DATED: October 10, 2023

<p>Nicoll Black &amp; Feig, PLLC</p> <p>By: <u>/s/Curt Feig</u>  Curt Feig, WSBA #19890  1325 4th Ave, Ste 1650,  Seattle, WA 98101  Phone: 206-838-7543  cfeig@nicollblack.com</p> <p>Attorneys for Defendants</p>	<p>Stein, Sudweeks &amp; Stein, PLLC</p> <p>By: <u>/s/Cortney Feniello</u>  Jerry H. Stein, WSBA #27721  jstein@condodeflects.com  Justin D. Sudweeks, WSBA #28755  justin@condodeflects.com  Daniel J. Stein, WSBA #48739  dstein@condodeflects.com  Cortney M. Feniello, WSBA #57352  cfeniello@condodeflects.com</p> <p>Attorneys for Plaintiff</p>
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**ORDER**

Based on the above Stipulated Motion, IT IS SO ORDERED that the discovery and dispositive motions deadlines be extended as follows:

Event	Current Deadline	New Deadline
Discovery Motion Deadline	9/27/2023	10/27/2023
Rebuttal Expert Deadline	10/11/2023	11/10/2023
Discovery Deadline	10/30/2023	11/30/2023
Dispositive Motions Deadline	11/27/2023	12/18/2023

No other deadlines or events are altered.

IT IS SO ORDERED this 11th day of October, 2023.



Jamal N. Whitehead  
United States District Judge